

Exhibit 1

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF NORTH CAROLINA
SOUTHERN DIVISION

No. 7:23-cv-162

ANDREW U.D. STRAW,)
)
Plaintiff,)
)
v.)
)
UNITED STATES OF AMERICA,)
)
Defendant.)

DECLARATION OF HAROON ANWAR

I, Haroon Anwar, declare as follows:

1. I am over the age of 18, am competent to testify, and have personal knowledge of the facts stated herein.
2. I am a Trial Attorney in the Environmental Torts Litigation Section of the U.S. Department of Justice's Civil Division.
3. I respectfully submit this Declaration, pursuant to Federal Rule of Civil Procedure 56(d), to show that essential discovery is required before the United States is able to respond to Plaintiff Andrew U. D. Straw's request for summary judgment.
4. Plaintiff filed this personal injury action on February 17, 2023, pursuant to the Camp Lejeune Justice Act of 2022 ("CLJA"), Pub. L. No. 117-168, § 804, 136 Stat. 1802, 1802-04 (2022). [Dkt. 1.] Plaintiff seeks tens of millions of dollars in money damages for a variety of injuries he alleges were caused by exposure to water at Camp Lejeune, including bipolar disorder, schizophrenia, and "autistic thinking."

5. On April 5, 2023, Plaintiff filed a motion seeking summary judgment in his favor. [Dkt. 10]. Plaintiff did not submit expert testimony in support of his motion or personal injury claims.
6. No case management or discovery has taken place in Plaintiff's case, and Plaintiff filed his request for summary judgment before the United States even had an opportunity to answer Plaintiff's Complaint.
7. The United States is unable to respond to Plaintiff's summary judgment motion without an opportunity to engage in meaningful fact and expert discovery. In order to respond, the United States would need an opportunity to engage fact and expert discovery about Plaintiff's medical condition, medical history, and details about his alleged exposure to contaminated water at Camp Lejeune to assess causation under the CLJA, as well as his alleged damages.
8. Accordingly, Plaintiff's request for summary judgment is premature and should be denied under Fed. R. Civ. P. 56(d)(1).

I declare under penalty of perjury that the foregoing is true and correct

/s/Haroon Anwar
Haroon Anwar

April 24, 2023
Date